

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: KEITH CARMINE BURRELL

Debtor

Chapter 13

No. 18-17760-MDC

DEBTOR'S ANSWER TO STANDING TRUSTEE'S MOTION TO DISMISS DEBTOR'S
CHAPTER 13 CASE FOR DEBTOR'S ALLEGED FAILURE TO MAKE
CHAPTER 13 PLAN PAYMENTS.

NOW COMES the Debtor, Keith Carmine Burrell, by and through his attorney, Alan Brian Jones, Esquire, and submits this Answer to the Standing Trustee's Motion to Dismiss the Debtor's Chapter 13 Case for the Debtor's alleged failure to remit to the Standing Trustee all of Debtor's Chapter 13 Plan monthly payments pursuant to Debtor's Chapter 13 Plan, and states as follows:

1. Firstly, the Debtor apologizes for this tardy filing of this Answer as this Answer was to be filed by August 14, 2019.
2. But due the fact that the Debtor's attorney was ill with Blood Clots in both of his lungs during the majority of August 2019, this is the Debtor's attorney's first opportunity to properly respond to the Standing Trustee's Motion to Dismiss.
3. Therefore, the Debtor and his attorney pray for the Court's indulgence for this tardy filing.
4. According to the records of the Debtor, and verified by the Debtor's attorney, the Debtor has been, and is, timely in his Chapter 13 payments.

5. A list of these money order payments are a follows:

- a) Date of payment: 04/22/2019 in the amount of \$400.00;
- b) Date of payment: 05/06/2019 in the amount of \$400.00;
- c) Date of payment: 05/31/2019 in the amount of \$200.00;
- d) Date of payment: 06/26/2019 in the amount of \$200.00;
- e) Date of payment: 07/24/2019 in the amount of \$200.00; and
- f) Date of payment: 08/19/2019 in the amount of \$200.00.

6. Consequently, the Debtor's total Chapter 313 payments made to the Standing Trustee as of August 19, 2019 is \$1,600.00.

7. If indeed the Debtor is incorrect, and the Debtor has inadvertently missed a payment, once the Debtor is notified of the delinquent payment and the amount due thereon, the Debtor shall immediately remit this delinquent payment to the Standing Trustee.

8. The above statements are made to the Court under the penalties of perjury.

Dated: August 25, 2019



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